

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In Re DMCA Subpoena to Amazon.com
Sales, Inc.

Case No.: _____

**United States Luggage Company, LLC
d/b/a Solo New York's Request to the
Clerk for Issuance of Subpoena to
Amazon.com Sales, Inc. Pursuant to
17 U.S.C. § 512(h) to Identify Alleged
Infringers**

Petitioner, United States Luggage Company, LLC d/b/a Solo New York (hereinafter “Solo New York”) through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Amazon.com Sales, Inc. to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (hereinafter the “DMCA Subpoena”). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to Amazon.com Sales, Inc., the service provider of posts to which the infringing parties posted content at various URLs. The DMCA Subpoena requests the names, addresses, and email addresses of each of the infringers identified in Schedule A to the Subpoena, attached hereto as Exhibit A. The content posted by these sellers infringes a copyright held by Solo New York. (*See* Declaration of Attorney Michael R. Stanley dated September 15, 2023 (hereinafter “Counsel Decl.”)).

Solo New York has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

1. Solo New York has submitted a copy of the notification sent pursuant to 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to Counsel Decl.;

2. Solo New York has submitted the proposed DMCA Subpoena attached hereto as Exhibit A; and
3. Solo New York, through its counsel of record, has submitted a sworn declaration confirming that the purpose for which the DMCA subpoena is sought is to obtain the identity of alleged infringers, and that such information will only be used for the purpose of protecting Solo New York's rights under Title 17 U.S.C. §§100, et. seq.. *See* Counsel Decl., ¶ 4.

Having complied with the statutory requirements, Solo New York respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4).

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

Respectfully submitted,

Plaintiff,

United States Luggage Company, LLC d/b/a
Solo New York,

by its attorneys,

/s/ Michael R. Stanley
Michael R. Stanley (BBO No. 680957)
Joseph L. Demeo (BBO No. 561254)
DEMEO, LLP
66 Long Wharf
Boston, MA 02110
Tel: (617) 263 2600
jdemeo@demeollp.com
mstanleydemeollp.com

Dated: September 18, 2023